

Message

From: Vakalopoulos, Catherine (DEP) [Catherine.Vakalopoulos@MassMail.State.MA.US]
Sent: 9/28/2016 8:45:55 PM
To: Harding, George [harding.george@epa.gov]
CC: Nerden, Joseph (DEP) [joseph.nerden@state.ma.us]; Kipka, Undine [kipka.undine@epa.gov];
Susannah.king@state.ma.us
Subject: FW: NPDES MA0003590 - CRMF Prison Point OWS effluent sampling conditions
Attachments: MA0003590_Letter_to_EPA9-21-15.pdf

ENFORCEMENT SENSITIVE

Hi George,

Joe Nerden and I have concerns about

Ex. 5 Deliberative Process (DP)

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I'm trying to gather as much information as I can before our next site visit

on October 12th.

Thanks.

Cathy

Cathy Vakalopoulos, Massachusetts Department of Environmental Protection
1 Winter St., Boston, MA 02108, 617-348-4026



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From: COUTU Clary [mailto:clary.coutu@keoliscs.com]
Sent: Monday, September 19, 2016 1:24 PM
To: Nerden, Joseph (DEP); Marian Rambelle; Vakalopoulos, Catherine (DEP); Papadopoulos, George; Kipka, Undine;
George Harding; Todd J. Borci (borci.todd@epa.gov)
Cc: Bill Betters; Brander, Kevin (DEP)
Subject: RE: NPDES MA0003590 - CRMF Prison Point OWS effluent sampling conditions

Joe, Undine et al:

During our meeting last month, we discussed the need to identify an alternate effluent sampling location as a result of the GLX project's new drainage system bypass of the Prison Point OWS. As we discussed at that time, an internal meeting amongst Keolis and its contractors will be held this month to review the new system and determine a proposed alternate effluent sampling location. This proposal will then be presented to EPA and MassDEP for discussion at our upcoming follow-up site meeting, scheduled for October 12. Thus, we will continue to conduct effluent sampling at the Prison Point OWS, as feasible, until an alternate sampling location is approved.

Presently, we are following the procedure we identified in September 21, 2015 letter to George Harding of EPA, which included collecting a sample from Millers River, but as discussed, these are not reported. Presently at any sampling event, if there is insufficient flow, we will use the NODI-F code as discussed during the August field inspection until the new sampling plan is approved.

WE have scheduled time to internally have a discussion of the System Requirements and a proposal will be prepared for discussion during our meeting.

Regards,

Clary Coutu

From: Nerden, Joseph (DEP) [<mailto:Joseph.Nerden@MassMail.State.MA.US>]
Sent: Friday, September 16, 2016 10:13 AM
To: Marian Rambelle <mrambelle@cdwconsultants.com>; Vakalopoulos, Catherine (DEP) <catherine.vakalopoulos@state.ma.us>; Papadopoulos, George <papadopoulos.george@epa.gov>; Kipka, Undine <kipka.undine@epa.gov>; George Harding <harding.george@epa.gov>; Todd J. Borci (borci.todd@epa.gov) <borci.todd@epa.gov>
Cc: COUTU Clary <clary.coutu@keolis.com>; Bill Betters <bbetters@cdwconsultants.com>; Brander, Kevin (DEP) <kevin.brander@state.ma.us>
Subject: RE: NPDES MA0003590 - CRMF Prison Point OWS effluent sampling conditions

Greeting all,

I'm unclear as to why sampling is still being performed at the OWS. During the meeting last month, referenced below, it was clear that more than 90% of flow bypasses the OWS and now connects directly to the three existing outfall pipes via the new GLX junction structure designated as MH 13.4. Sampling should be taken at the discharge location or an appropriate upstream location such as MH 13.4. MBTA's September 21, 2015, letter to EPA (see attached) states that there were sampling issues due to low flow during GLX dewatering activities. It did not address flows bypassing the OWS. I do not believe the MBTA has submitted a proposal to revise the NPDES sampling location as result of the completed GLX stormwater infrastructure improvements.

If flow (at this time) is insufficient to collect a dry weather sample (at an appropriate location), then NODI Code F would be acceptable. There is also a requirement for a monthly wet weather sample, which should be adhered to. We know rains have been infrequent, but there should be a sufficient response even during a small rain event (0.1 inch is identified in the permit) to do the wet weather sampling.

Joe

Joseph E. Nerden // Environmental Engineer IV // Municipal Services/Water Pollution Control/Wastewater Management // MassDEPNortheast Regional Office // 205B Lowell Street // Wilmington, MA 01887 //Phone: (978) 694-3239 //Fax: (978) 694-3499 //email: Joseph.Nerden@state.ma.us
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From: Marian Rambelle [<mailto:mrambelle@cdwconsultants.com>]
Sent: Thursday, September 15, 2016 2:06 PM
To: Vakalopoulos, Catherine (DEP); Papadopoulos, George; Kipka, Undine; Nerden, Joseph (DEP)
Cc: COUTU Clary; Bill Betters
Subject: NPDES MA0003590 - CRMF Prison Point OWS effluent sampling conditions

Good afternoon all,

We'd like to follow up with you from our meeting last month at CRMF, regarding NPDES permit effluent sampling and potential insufficient flow conditions at the Prison Point OWS. As you know, the GLX project dewatering activities have been causing a decrease in the flows in the Prison Point OWS. We recall discussing at that time with some of you that, in the event there is insufficient water in the Prison Point OWS to conduct sampling, effluent samples will not be collected and that "Insufficient Flow for Sampling" (NODI Code F) will be indicated on the DMR.

We will plan to follow that approach, but would appreciate if you can confirm that when you have a chance. This situation could occur if a wet weather sampling opportunity presents itself on Sunday or Monday; unfortunately, wet weather sampling opportunities have been quite rare during the ongoing drought we're experiencing this quarter.

Thank you, and please let us know if you have any questions,

Marian

Marian Rambelle
Senior Environmental Engineer

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